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Subject Pilot Joe

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Re: Pilot Joe  
May 6, 2011

This letter offers scoping comments from the Klamath-Siskiyou Wildlands Center (KS Wild), Oregon Wild, and the Cascadia Wildlands regarding the Pilot Joe project. Contact information for our organizations may be found at the end of this document.

We generally support the dry forest restoration principals of Drs. Johnson and Franklin. Protecting large trees and roadless areas, thinning forests that are overly dense and focusing restoration activities outside of the most important northern spotted owl habitat are all important aspects of those principles that are being applied to this project. We commend the BLM if it is embracing those restoration goals for this project and in future planning efforts.

KS Wild has been very involved in the collaborative process around the Middle Applegate Pilot. KS Wild has offered logistical, outreach and technical assistance in the planning process in dozens of meetings on the pilot over the past several months. We appreciate the BLM's openness to a collaborative process and hope that the BLM uses this approach in more projects in the future. We firmly believe it is the only way to produce good projects that incorporate authentic restoration and community buy-in.

Please remember that comprehensive forest restoration includes more than stand level silvicultural manipulation, such as road stormproofing and decommissioning, noxious weed abatement, and in stream wood placement. While this project focuses on silvicultural aspects of forest restoration, the BLM should advance the broader goals of forest and watershed restoration.

As the BLM moves forward with planning of this important project, we ask that they keep a few things in mind:

Roads: Road construction is possibly the most controversial aspect of this pilot project. At every public meeting and field trip on the pilot, roads have been discussed with strong local opposition to creating more roads on the landscape. We appreciate the BLM's willingness to evaluate the costs and benefits to each road with the amount of restoration that would be accomplished by building those road segments.

Building new road leads to a series of well-documented ecological and

social impacts. For example, in the Appelgate Valley and in the project area, off road vehicles are very common, and several areas have become destinations for ORVs. Some ORV users are very destructive, and take to any new opportunity to use even the slightest track, or create their own routes. New roads can become vectors for this activity, and open up more of the landscape to this potentially very destructive activity. New roads also become new trash dumps where all sorts of garbage are disposed of on these public lands.

Specific to this project, the roads that would need to be constructed to access units 27-1 and 34-2 are poor trade offs for the amount of restoration that would be achieved. Proposed unit 27-1 has questionable merit from a restoration standpoint, so the construction of the approximately ½ mile of new road to reach the stand is not appropriate. The stand is comprised of larger, open grown trees.

Unit 34-2 might benefit from restoration thinning, but the required cut and fill road at a mid-slope position would create too much damage for the potential restoration benefit, as the unit is only about 18 acres in size. Again, it is not worth the restoration benefit given the impacts of the new road. It is our understanding that units 34-2 and 27-1 have been dropped from consideration for commercial logging, removing the need to construct road to access these areas.

We do not support the proposed road in unit 31-4A. The reconstruction of the road that would be required is to access that unit is too potentially harmful to the area. Chapman Creek is fish bearing stream and the road and haul route near and over that stream is too risky to the stream. We support alternative means to address the thinning needs in the northerly portion of 31-3A. Using cable systems from the road in the upslope position might be an alternative. In the May 5 2011 field trip, Dr. Lauren Kellog described this system.

The short operator spur along ridgetop in 32-1 should be narrow in width and low in gradient profile. This will contribute less impact than a road that would require cut and fill or bench construction on a mid-slope position. Please describe any in unit turnarounds or landings and minimize the impacts and anticipate and incorporate these into the silviculture. Please avoid these impacts when possible. Also, maintain the large legacy trees on the ridgetop location in 32-1 by designing a low impact road that avoids those large trees.

It is essential that the Ashland Resource Area begin to reduce impacts of the existing road density within the planning area on hydrological function and terrestrial resources. The BLM did suggest some road decommissioning in the China Keeler project. Will the BLM consider those decommissioning efforts in this project? Please take this opportunity to work with the interested public to improve aquatic health and terrestrial wildlife connectivity by identifying and decommissioning BLM roads that are not needed for agency management activities.

Vehicular travel is the highest risk vector for non-native plant invasions. Be explicit about mitigation measures and their effectiveness under similar site conditions. Learn from past operations. Do not simply rely on generic mitigation measures from the Resource Management Plan that have not proven effective in this landscape.

Fuels Reduction: One of the Franklin and Johnson principals for restoring dry forests is assuring that activity fuels are removed. How will the BLM make sure that this occurs? Please analyze that in the NEPA

process. To simply do the thinning and not address the activity fuels would actually increase fire risk as has been demonstrated in many studies on the issue. The BLM must tie the activity fuels treatment to the project in a way that ensures this is not the case.

There is a proposal to treat an additional 600 acres in the planning area through non-commercial means. We think this is a very important part of the project. Many of those stands are younger and would benefit from intervention at this successional stage. What are the types of treatments that would be proposed? Will the variable density approach as is outlined in the restoration principles be applied to the non-commercial areas? We ask that the BLM consider leaving all broadleaf trees 6 inches in diameter and greater.

Yarding and logging systems: Low impact, innovative logging systems should be utilized in the project. That is part of the charter of the Applegate Adaptive Management Area, which is the land use allocation where the project is planned. Working with contractors to design and implement a project that uses light-on-the-land yarding systems is critical to the success of this pilot. Yarding can cause significant soil disturbance, which should be avoided. Please protect soils and riparian areas from disturbance by employing low-impact yarding systems.

We are encouraged that Lauren Kellog is attempting to design low-impact systems. Please take that opportunity to show how these systems can be used to minimize soil disturbance, erosion, noxious weed spread and other common problems from yarding systems in the Siskiyou Mountains.

The restoration principals include a variable density approach to better mimic the historic variability in the project area. Traditional yarding systems cannot accomplish the variable density that was characteristic in the planning area. Please design yarding systems to keep the skips and use this opportunity to demonstrate how that can be accomplished without losing the elements on the landscape that the principles are designed to protect.

Owl Habitat: Northern Spotted Owl habitat remains an issue in the project area. We are intrigued by the LSEA approach that Drs. Johnson and Franklin described for use in this project. Please avoid owl "take" by making the LSEAs large enough for owl nesting, roosting and foraging around high use areas. Please consider focusing thinning activities on small-diameter trees in a variable "thin from below" to retain mature and late-successional forest character where it still exists.

Late-Successional Forests: KS Wild supports thinning in many of the stands that are in this project. We continue to have concerns about a small subset of the mark where large trees could be cut where there are small patches of older forest. We are hopeful that the mark will be reined to fix those problems. The restoration principals generally would keep the largest, oldest trees in the stands, but that requires that skips are in places where these older structure exist. It also require that the BLM layout and marking crews understand that these are flexible principals that require some

Watershed Concerns: Please note and adhere to the Watershed Analysis recommendations for the project. The BLM should avoid cumulative impacts of this project on watershed health and other resources of concern. Please don't take actions that will lead to sediment in Chapman or Keeler Creeks. Take caution in the non-commercial units if you are entering riparian reserves. Threatened and sensitive fish species and

their critical habitat exist near and downstream of the project area. Aquatic conservation is therefore a significant issue for this action.

Collaboration: We are hopeful that the collaborative approach used thus far in the pilot will become the standard operating procedure for BLM management in Southern Oregon. Getting the community and interested stakeholders information early in the planning process, and allowing community and stakeholder concerns to be addressed in the early planning stages will be key to BLM forest management success in the future.

Thank you for considering these comments.

/s/ Joseph Vaile

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